

EXHIBIT G

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	Case No.: 1:20-cv-00988-DAD-BAM DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR PRODUCTION
HYPHY MUSIC, INC., v. HYPHY MUSIC, INC., Counterclaimant, v. HYPHY MUSIC, INC.; COLONIZE MEDIA, INC; JOSE DAVID HERNANDEZ; and JESUS CHAVEZ SR, Counterdefendants.	

**DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO
PLAINTIFFS/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR
PRODUCTION**

1 PROPOUNDING PARTY: Plaintiff/Counterdefendants
2
3
4
5 RESPONDING PARTY: Defendant/Counterclaimant
6
7 SET NUMBER: ONE (1)

8 Pursuant to Rule 34 of the Federal Rules of Civil Procedure (“FRCP”),
9 Defendant/Counterclaimant HYPHY MUSIC, INC. (“Responding Party”), hereby
10 responds to Plaintiff/Counterdefendants’ YELLOWCAKE, INC., COLONIZE
11 MEDIA, INC., and JOSE DAVID HERNANDEZ (collectively, “Requesting Party”)
12 First Set of Requests for Production.

13 **PRELIMINARY STATEMENT**

14 Responding Party makes these responses solely for the purpose of this action.
15 Responding Party has not fully completed its investigation of the facts relating to
16 this case, has not completed its discovery, and has not completed its preparation for
17 trial in this matter. Accordingly, all of the responses contained herein are based
18 solely upon information and documents that are presently available to and
19 specifically known to Responding Party. Further discovery and independent
20 investigation may supply additional facts and documents which may, in turn, clarify
21 and add meaning to known facts as well as establish entirely new matters, all of
22 which may lead to substantial additions to, changes in, and variations from the
23 responses set forth herein. The following responses are given without prejudice to
24 Responding Party’s right to produce evidence of any subsequently discovered fact(s)
25 or document(s) that later may be recalled. Accordingly, Responding Party reserves
26 the right to produce at trial all facts, opinions, or documents, the existence of which

1 are subsequently discovered through investigation, discovery, or otherwise, which
2 support or tend to support its contentions at the time of trial.

3 Any information provided in response to the Requests is subject to any and all
4 objections regarding competence, relevance, materiality, propriety and admissibility.
5 Responding Party reserves these objections and any other objections not stated
6 herein that would require the exclusion of any information, if such information is
7 offered as evidence at any time during this action. Responding Party may interpose
8 these objections at any time prior to and during the trial of this case. Further,
9 attorneys' work product and/or privileged information are not referred to herein.
10 Any disclosure of or reference herein to attorney-client privileged information or
11 attorney work product is inadvertent and does not constitute a waiver such privilege.

12 No incidental or implied admissions are intended by these responses. The
13 fact that Responding Party responds to or objects to a Request should not be taken
14 as an admission that Responding Party accepts or admits the existence of any facts
15 or legal conclusions assumed or presumed by the Request. The fact that Responding
16 Party responds to part or all of a Request is not intended to be, and shall not be,
17 construed as a waiver by Responding Party of any part of any objection to the
18 Request.

19 **RESPONSES TO REQUESTS FOR PRODUCTION**

20 **REQUEST FOR PRODUCTION NO. 1:**

21 Produce all documents concerning or related to Defendants' exploitation of
22 Yellowcake's Copyrighted Works including, but not limited to, such exploitation on
23 digital distribution platforms such as YouTube, Amazon.com, and Spotify.
24 Responsive documents shall include, but are not limited to, any: (i) royalty
25 statements; (ii) contracts; (iii) reconciliations; (iv) payment receipts; (v) advertising
26 copy; (vi) videos; (vii) "dashboard" information; and (viii) documents including, but
27 not limited to, any royalty statements from any national or international performing
28

1 rights organization such as ASCAP, BMI, SESAC, PRS for Music, Sound Exchange
2 or Mechanical Licensing Collective.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

4 Responding Party will comply with this Request and is producing all
5 documents presently in Responding Party's possession, custody and/or control,
6 identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing.
7 As such, Responding Party reserves the right to supplement, amplify or amend its
8 responses to this Request.

9 **REQUEST FOR PRODUCTION NO. 2:**

10 Produce all copies of any video, website, social media posting, or other
11 document or file containing all or any part of any of Yellowcake's Copyrighted
12 Works, and all metadata associated with such files.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

14 Responding Party will comply with this Request and is producing all
15 documents presently in Responding Party's possession, custody and/or control,
16 identified as: Responding Party will produce all files responsive hereto in their
17 native format concurrently herewith. Additionally, discovery is ongoing. As such,
18 Responding Party reserves the right to supplement, amplify or amend its responses
19 to this Request.

20 **REQUEST FOR PRODUCTION NO. 3:**

21 Produce all documents (including but not limited to emails, letters, texts and
22 other correspondence) by, between, or among Plaintiff and Defendant concerning or
23 regarding any of Yellowcake's Copyrighted Works.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

25 After a diligent search, no such documents presently exist in Responding
26 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
27

1 such, Responding Party reserves the right to supplement, amplify or amend its
2 responses to this Request.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 Produce all internal documents (including but not limited to emails, letters,
5 texts and other correspondence) by, between, or among Defendant concerning or
6 regarding any of Yellowcake's Copyrighted Works.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

8 After a diligent search, no such documents presently exist in Responding
9 Party's possession, custody and/or control. Additionally, discovery is ongoing.
10 Additionally, discovery is ongoing. As such, Responding Party reserves the right to
11 supplement, amplify or amend its responses to this Request.

12 **REQUEST FOR PRODUCTION NO. 5:**

13 Produce all documents (including but not limited to emails, letters, texts and
14 other correspondence) by, between, or among Defendant and any third-party
15 concerning or regarding any of Yellowcake's Copyrighted Works.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

17 After a diligent search, no such documents presently exist in Responding
18 Party's possession, custody and/or control. Additionally, discovery is ongoing.
19 Additionally, discovery is ongoing. As such, Responding Party reserves the right to
20 supplement, amplify or amend its responses to this Request.

21 **REQUEST FOR PRODUCTION NO. 6:**

22 Produce all documents (including but not limited to emails, letters, texts and
23 other correspondence) concerning, regarding, or relating to the exploitation by
24 Defendant, or anyone acting on its behalf, of any of Yellowcake's Copyrighted
25 Works.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

2 Responding Party will comply with this Request and is producing all
3 documents presently in Responding Party's possession, custody and/or control,
4 identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing.
5 Additionally, discovery is ongoing. As such, Responding Party reserves the right to
6 supplement, amplify or amend its responses to this Request.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 Produce all documents sufficient to identify the name, and address, and job
9 title of each employee, contractor, or agent of Defendant who had any role in
10 designing, creating, programming, uploading, reviewing, and/or monitoring any
11 video, website, social media posting, or other content containing all or any part of
12 any of Yellowcake's Copyrighted Works.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

14 Responding Party will comply with this Request and is producing all
15 documents presently in Responding Party's possession, custody and/or control,
16 identified as: HYPHY000009-HYPHY000028. Additionally, discovery is ongoing.
17 As such, Responding Party reserves the right to supplement, amplify or amend its
18 responses to this Request.

19 **REQUEST FOR PRODUCTION NO. 8:**

20 Produce all documents concerning, regarding, or relating to any investigation
21 you have made concerning Defendant's exploitation of Yellowcake's Copyrighted
22 Works.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

24 After a diligent search, no such documents presently exist in Responding
25 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
26 such, Responding Party reserves the right to supplement, amplify or amend its
27 responses to this Request.

1 **REQUEST FOR PRODUCTION NO. 9:**

2 Produce all documents concerning, regarding, or relating to any actual or
3 potential license you have ever obtained for the exploitation of any of Yellowcake's
4 Copyrighted Works.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

6 After a diligent search, no such documents presently exist in Responding
7 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
8 such, Responding Party reserves the right to supplement, amplify or amend its
9 responses to this Request.

10 **REQUEST FOR PRODUCTION NO. 10:**

11 Produce all contracts or other agreements, and any amendments thereto, by,
12 between, or among Defendant and Plaintiff.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

14 After a diligent search, no such documents presently exist in Responding
15 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
16 such, Responding Party reserves the right to supplement, amplify or amend its
17 responses to this Request.

18 **REQUEST FOR PRODUCTION NO. 11:**

19 Produce all contracts or other agreements, and any amendments thereto, by,
20 between, or among Defendant and Colonize.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

22 After a diligent search, no such documents presently exist in Responding
23 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
24 such, Responding Party reserves the right to supplement, amplify or amend its
25 responses to this Request.

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1 **REQUEST FOR PRODUCTION NO. 12:**

2 Produce all contracts or other agreements, and any amendments thereto, by,
3 between, or among Defendant and any third-party that concerns any of
4 Yellowcake's Copyrighted Works.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

6 Responding Party will comply with this Request and is producing all
7 documents presently in Responding Party's possession, custody and/or control,
8 identified as: HYPHY000009-HYPHY000024. Additionally, discovery is ongoing.
9 As such, Responding Party reserves the right to supplement, amplify or amend its
10 responses to this Request.

11 **REQUEST FOR PRODUCTION NO. 13:**

12 Produce all documents, reflecting or concerning any revenue derived by
13 Defendant arising from the exploitation of Yellowcake's Copyrighted Works,
14 including, but not limited to, any royalty statements, spreadsheets, logs, ledgers,
15 copies of checks and wire transfers.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

17 Responding Party will comply with this Request and is producing all
18 documents presently in Responding Party's possession, custody and/or control,
19 identified as: HYPHY000054-HYPHY000158. Additionally, discovery is ongoing.
20 As such, Responding Party reserves the right to supplement, amplify or amend its
21 responses to this Request.

22 **REQUEST FOR PRODUCTION NO. 14:**

23 Produce all of the financial statements, profit and loss statements, net income
24 statements, balance sheets, financial forecasts, projections, internal memoranda,
25 ledgers, journals, bookkeeping entries, and business plans of Defendants from 2015
26 through the present.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

2 After a diligent search, no such documents that are not otherwise protected by
3 Responding Party's rights of privacy or the attorney-client and/or attorney work
4 product doctrine presently exist in Responding Party's possession, custody and/or
5 control. Additionally, discovery is ongoing. As such, Responding Party reserves the
6 right to supplement, amplify or amend its responses to this Request.

7 **REQUEST FOR PRODUCTION NO. 15:**

8 Produce all documents pertaining to your policies and procedures for
9 addressing claims by licensors concerning the exploitation of intellectual property
10 beyond the licensors' contractual authorizations.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

12 After a diligent search, no such documents presently exist in Responding
13 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
14 such, Responding Party reserves the right to supplement, amplify or amend its
15 responses to this Request.

16 **REQUEST FOR PRODUCTION NO. 16:**

17 Produce all documents (including but not limited to emails, letters, texts and
18 other correspondence) concerning the creation of Los Originales Cover Art
19 referenced in paragraph 18 of the Counterclaim.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

21 Responding Party will comply with this Request and is producing all
22 documents presently in Responding Party's possession, custody and/or control,
23 identified as: HYPHY000001-HYPHY000008, HYPHY000031-HYPHY000033,
24 HYPHY000042-HYPHY000043, and HYPHY000045. Additionally, discovery is
25 ongoing. As such, Responding Party reserves the right to supplement, amplify or
26 amend its responses to this Request.

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1 **REQUEST FOR PRODUCTION NO. 17:**

2 Produce all documents (including but not limited to copyright registrations,
3 copyright applications, contracts, work-for-hire agreements, employment
4 agreements, emails, letters, texts and other correspondence) concerning Hyphy's
5 alleged ownership of the Los Originales Cover Art referenced in paragraph 18 of the
6 Counterclaim.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

8 Responding Party will comply with this Request and is producing all
9 documents presently in Responding Party's possession, custody and/or control,
10 identified as: HYPHY000001-HYPHY000008, HYPHY000031-HYPHY000033,
11 HYPHY000042-HYPHY000043, and HYPHY000045. Additionally, discovery is
12 ongoing. As such, Responding Party reserves the right to supplement, amplify or
13 amend its responses to this Request.

14 **REQUEST FOR PRODUCTION NO. 18:**

15 Produce all documents (including but not limited to emails, letters, texts and
16 other correspondence) by, between, or among Defendant and any of the Yellowcake
17 Parties concerning the Los Originales Cover Art referenced in paragraph 18 of the
18 Counterclaim.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

20 After a diligent search, no such documents presently exist in Responding
21 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
22 such, Responding Party reserves the right to supplement, amplify or amend its
23 responses to this Request.

24 **REQUEST FOR PRODUCTION NO. 19:**

25 Produce all documents (including but not limited to emails, letters, texts and
26 other correspondence) by, between, or among Defendant and Jesus Chavez Sr.

1 concerning the Los Originales Cover Art referenced in paragraph 18 of the
2 Counterclaim.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

4 After a diligent search, no such documents presently exist in Responding
5 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
6 such, Responding Party reserves the right to supplement, amplify or amend its
7 responses to this Request.

8 **REQUEST FOR PRODUCTION NO. 20:**

9 Produce all documents (including but not limited to emails, letters, texts and
10 other correspondence) by, between, or among Defendant and Jesus Chavez Sr.
11 concerning any of the Yellowcake Parties.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

13 After a diligent search, no such documents presently exist in Responding
14 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
15 such, Responding Party reserves the right to supplement, amplify or amend its
16 responses to this Request.

17 **REQUEST FOR PRODUCTION NO. 21:**

18 Produce all contracts or other agreements, and any amendments thereto, by,
19 between, or among Defendant and Jesus Chavez Sr. concerning the Los Originales
20 Cover Art referenced in paragraph 18 of the Counterclaim.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

22 After a diligent search, no such documents presently exist in Responding
23 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
24 such, Responding Party reserves the right to supplement, amplify or amend its
25 responses to this Request.

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1 **REQUEST FOR PRODUCTION NO. 22:**

2 Produce all contracts or other agreements, and any amendments thereto, by,
3 between, or among Defendant and any third-party concerning the Los Originales
4 Cover Art referenced in paragraph 18 of the Counterclaim.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

6 After a diligent search, no such documents presently exist in Responding
7 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
8 such, Responding Party reserves the right to supplement, amplify or amend its
9 responses to this Request.

10 **REQUEST FOR PRODUCTION NO. 23:**

11 Produce all documents, including, but not limited to, all contracts or other
12 agreements, and any amendments thereto, substantiating an alleged work for hire
13 relationship between Defendant and Jesus Chaves Sr.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

15 After a diligent search, no such documents presently exist in Responding
16 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
17 such, Responding Party reserves the right to supplement, amplify or amend its
18 responses to this Request.

19 **REQUEST FOR PRODUCTION NO. 24:**

20 Produce all documents, including, but not limited to, all contracts or other
21 agreements, and any amendments thereto, concerning Jesus Chaves Sr.'s alleged
22 employment with Defendant.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

24 After a diligent search, no such documents presently exist in Responding
25 Party's possession, custody and/or control. Additionally, discovery is ongoing. As
26 such, Responding Party reserves the right to supplement, amplify or amend its
27 responses to this Request.

1 **REQUEST FOR PRODUCTION NO. 25:**

2 Produce all documents concerning Defendant's filing of copyright
3 registrations in the Los Originales Albums referenced in paragraph 17 of the
4 Counterclaim including, but not limited to any copyright registration certificates,
5 copyright applications or supporting documents submitted to the U.S. Copyright
6 Office.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

8 Responding Party will comply with this Request and is producing all
9 documents presently in Responding Party's possession, custody and/or control,
10 identified as: HYPHY000001-HYPHY000008. Additionally, discovery is ongoing.
11 As such, Responding Party reserves the right to supplement, amplify or amend its
12 responses to this Request.

13 **REQUEST FOR PRODUCTION NO. 26:**

14 Produce all documents that substantiate that Defendant is a co-author, co-
15 owner, and/or joint owner of all copyrights in the Los Originales Albums referenced
16 in paragraph 16 of the Counterclaim.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

18 Responding Party will comply with this Request and is producing all
19 documents presently in Responding Party's possession, custody and/or control,
20 identified as: HYPHY000009-HYPHY00024, HYPHY000029-HYPHY000030,
21 HYPHY000034-HYPHY00041, HYPHY000044, and HYPHY000046-
22 HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party
23 reserves the right to supplement, amplify or amend its responses to this Request.

24 **REQUEST FOR PRODUCTION NO. 27:**

25 Produce all documents concerning Defendant's involvement in the recording
26 of the Los Originales Albums referenced in paragraph 16 of the Counterclaim.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

2 Responding Party will comply with this Request and is producing all
3 documents presently in Responding Party's possession, custody and/or control,
4 identified as: HYPHY000009-HYPHY00024, HYPHY00029-HYPHY00030,
5 HYPHY00034-HYPHY00041, HYPHY00044, and HYPHY00046-
6 HYPHY00053. Additionally, discovery is ongoing. As such, Responding Party
7 reserves the right to supplement, amplify or amend its responses to this Request.

8 **REQUEST FOR PRODUCTION NO. 28:**

9 Produce all documents that demonstrate that Defendant has allegedly not
10 infringed Yellowcake's Copyrighted Works.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

12 Responding Party will comply with this Request and is producing all
13 documents presently in Responding Party's possession, custody and/or control,
14 identified as: HYPHY000009-HYPHY00024, HYPHY00029-HYPHY00030,
15 HYPHY00034-HYPHY00041, HYPHY00044, and HYPHY00046-
16 HYPHY00053. Additionally, discovery is ongoing. As such, Responding Party
17 reserves the right to supplement, amplify or amend its responses to this Request.

18 **REQUEST FOR PRODUCTION NO. 29:**

19 Produce all documents that allegedly support Defendant's Counterclaim.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

21 Responding Party will comply with this Request and is producing all
22 documents presently in Responding Party's possession, custody and/or control,
23 identified as: HYPHY000001-HYPHY00008, HYPHY00031-HYPHY00033,
24 HYPHY00042-HYPHY00043, and HYPHY00045. Additionally, discovery is
25 ongoing. As such, Responding Party reserves the right to supplement, amplify or
26 amend its responses to this Request.

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1 **REQUEST FOR PRODUCTION NO. 30:**

2 Produce all documents referred to in Defendant's Initial Disclosures Pursuant
3 to Federal Rule of Civil Procedure 26.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

5 Responding Party will comply with this Request and is producing all
6 documents presently in Responding Party's possession, custody and/or control,
7 identified as: HYPHY000001-HYPHY000158. Additionally, discovery is ongoing.
8 As such, Responding Party reserves the right to supplement, amplify or amend its
9 responses to this Request.

10 **REQUEST FOR PRODUCTION NO. 31:**

11 Produce all documents Defendant intends to rely on in the defense of this
12 action not already demanded herein.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

14 Responding Party will comply with this Request and is producing all
15 documents presently in Responding Party's possession, custody and/or control,
16 identified as: HYPHY000009-HYPHY00024, HYPHY000029-HYPHY000030,
17 HYPHY000034-HYPHY00041, HYPHY000044, and HYPHY000046-
18 HYPHY000053. Additionally, discovery is ongoing. As such, Responding Party
19 reserves the right to supplement, amplify or amend its responses to this Request.

20
21 DATED: March 31, 2022

ALTVIEW LAW GROUP, LLP

22
23 By: 
24

JOHN M. BEGAKIS
Attorneys for Defendant/Counterclaimant
HYPHY MUSIC, INC.

VERIFICATION

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)
ss.

I have read the foregoing **DEFENDANT/COUNTERCLAIMANT'S**
RESPONSES TO PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF
REQUESTS FOR PRODUCTION and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

X I am X an Officer a partner of Hyphy Music Inc., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. X The matters stated in the foregoing document are true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on March 29, 2022 at Fresno, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Jose Martinez
Type or Print Name

Signature

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California. I am over the age
4 of eighteen years and not a party to the within action; my business address is 12100
Wilshire Blvd., Suite 800, Los Angeles, CA 90025.

5 On March 31, 2022, I served the documents described as:

6 **DEFENDANT/COUNTERCLAIMANTS' RESPONSES TO**
7 **PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF**
INTERROGATORIES

8 **DEFENDANT/COUNTERCLAIMANT'S RESPONSES TO**
9 **PLAINTIFF/COUNTERDEFENDANTS' FIRST SET OF REQUESTS FOR**
PRODUCTION

10 on all interested parties in this action by placing the original a true copy
11 thereof enclosed in sealed envelope(s) addressed as follows:

12 Thomas P. Griffin, Jr., Esq.
13 HEFNER, STARK & MAROIS, LLP
2150 River Plaza Drive, Suite 450
Sacramento, CA 95833

14 Seth L. Berman, Esq.
15 ABRAMS, FENSTERMAN, EISMAN LLP
3 Dakota Drive, Suite 300
Lake Success, NY 11042

16 [X]: BY MAIL:

17 As follows: I am readily familiar with the firm's practice of collection and
18 processing correspondence for mailing. Under that practice, it would be deposited
19 with the U.S. Postal Service on the same day with postage thereon fully prepared at
20 Los Angeles, California, in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal cancellation date or
postage meter date is more than one day after date of deposit for mailing in affidavit.

21 [X]: (STATE) - I declare under penalty of perjury under the laws of the State of
22 California that the above is true and correct.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 EXECUTED on March 31, 2022, in Los Angeles, California.

25 
26 John Begakis